

## REMARKS

All of the claims were again rejected in the above-identified Office Action, primarily in view of the disclosure of the cited Suzuki reference. However, by this response independent Claims 55 and 56 have been amended in a manner which is believed to render those claims patentable over the Suzuki reference.

Specifically, Applicants' claims now relate to an imaging apparatus including a photoelectric conversion device having a plurality of substrates each having a plurality of photoelectric conversion elements and lead electrode portions on a principal surface thereof. The plurality of substrates are arranged adjacent each other in a plane, and a wavelength converting member is arranged on the photoelectric conversion elements over the plurality of substrates. A control circuit is connected to the lead electrode portions, for driving the device, and a housing is provided for the photoelectric conversion device and the control circuit. A grounded conductive member is disposed within the housing and is fixed (e.g. stuck) to the wavelength converting member. The claimed invention is further characterized by a resin that seals at least a portion of the principal surface of each of the substrates, at least a part of an end face of the conductive member, and at least a part of each lead electrode portion, wherein the plurality of substrates and the conductive member are in close proximity with other. Accordingly, by means of the claimed invention, unique advantages are provided such as (a) effective prevention of water intrusion into the panel between the panel surface and the conductive member, (b) effective prevention of water intrusion into

the fluorescent member, and (c) protection of semiconductors and metal wiring of the photoelectric conversion elements.

Referring to the cited prior art, Applicants note that the Suzuki reference discloses packing, with a filler such as an insulating rubber, a space formed between a sensor portion constituted by an X-ray fluorescent screen 26, an optical fiber 25, a CCD sensor 24, a substrate 23, a conductive member 22, a ground wire 32, an X-ray shielding member 21, and a container 20 surrounding the sensor portion. What the cited Suzuki and Crowell references do not disclose, however, is the above-mentioned key feature of the present invention of a resin sealing at least a portion of the principal surface of each of the substrates, at least a part of an end face of the conductive member, and at least a part of each lead electrode portion such that the plurality of substrates and the conductive member are in close proximity with each other. For these reasons it is clear that those two references also fail to disclose the additional unique feature of a grounded conductive member disposed within a housing and fixed to a wavelength converting member. Instead, in the cited Suzuki and Crowell references the conductive member is disposed on the housing, which may generate noise when the panel moves in the housing.

Again, in Applicants' claimed invention, the conductive member is fixed to the wavelength converting member. Therefore, even when the panel moves in the housing, the relative positional relationship between the conductive member and the panel will not change, whereby no noise is generated.

Finally, Applicants' new independent Claim 70 is patentable, along with all of the dependent claims, for the same reasons as given above with respect to Claims 55 and 56.

For these reasons Applicants' solicit the issuance of a formal Notice of Allowance.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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